

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Northern District of New York

United States of America

v.

PHILIP GURIAN and MICHELE LASSO, a/k/a
MICHELE MARIE LASSO-BARRAZA

Case No. 13-MJ-145 (RFT)

Defendant(s)

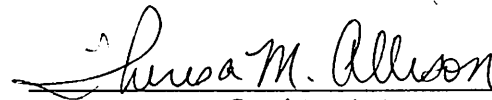
CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 1, 2009 through present in the county of Saratoga in the
Northern District of N.Y., and elsewhere, the defendant(s) violated:*Code Section**Offense Description*Title 18 United States Code,
Sections 1956(a)(1)(B)(i), and 1956
(h).

Conspiracy to Launder Monetary Instruments

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.*Complainant's signature*

Theresa M. Allison, Special Agent, IRS

Printed name and title

Sworn to before me and signed in my presence.

Date: 04/03/2013City and state: Albany, New York*Judge's signature*

Hon. Randolph F. Treece, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Theresa M. Allison, Affiant, being duly sworn, hereby depose and say that:

1. I am a Special Agent with the Internal Revenue Service, Criminal Investigation Division, ("IRS-CI"), United States Department of the Treasury, and have been so employed for over seven (7) years. I am currently assigned to the New York Field Office, Albany, New York Post of Duty. As a Special Agent, I am responsible for investigating criminal violations of the Internal Revenue Code (Title 26, United States Code), the Bank Secrecy Act (Title 31, United States Code), the Money Laundering Control Act (Title 18, United States Code), and related offenses. I have received specialized training in the investigation of white collar crimes and have been involved in the investigation of various financial crimes, fraudulent schemes, money laundering, tax evasion, failure to file, and conspiracy, among other offenses.
2. Most of the information in this affidavit is drawn from the investigation, observations, and experience of your Affiant and other law enforcement officers participating in the investigation, many of whom have experience investigating Organized Criminal Enterprises. The statements contained in this affidavit are based, in part, on information directly known to your Affiant as well as information provided by other law enforcement officers participating in the investigation, either directly or indirectly through their reports, and surveillance conducted by law enforcement officers, or other information gathered by the analysis of telephone toll records or analysis of IP addresses obtained via Pen Register. Unless otherwise stated, the following is based on information and belief, the source of my information and the basis for my belief being firsthand information acquired as a result of my personal participation in this investigation, which means that I have observed some of the activity in question, and that I have received first-hand and reliable information from other law enforcement officials as part of and in furtherance of the investigation. Specifically, this investigation is being conducted by your Affiant along with Special Agent TJ Roberts, Federal Bureau of Investigation (FBI), Investigators from the Albany County Sheriff's Office (ACSO), and the Broward County Sheriff's Office, Money Laundering Task Force (BCSOMLTF).
3. Because this Complaint is being submitted for the limited purpose of establishing probable cause, it does not include every fact that I have learned during the course of the investigation. Where the content of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

SUMMARY OF PROBABLE CAUSE

4. Based on the facts described below, there is probable cause to believe that:
 - a. During the years 2009 through present, **PHILIP GURIAN (Gurian)** and **MICHELE LASSO (Lasso) a/k/a MICHELE MARIE LASSO-BARRAZA (Lopez)**, did knowingly and willfully conspire and agree with each other and with others to conduct financial transactions knowing that they involved the proceeds of a specified unlawful activity, specifically the conducting of an illegal gambling business, in violation of Title 18, United States Code, Section 1955, among others, and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of property that was the proceeds of specified unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1)(B)(i) all in violation of Title 18, United States Code, Section 1956(h).

ILLEGAL GAMBLING ENTERPRISE

5. Evidence obtained in this investigation has determined that **Gurian** is alleged to be a "master agent" who turns over a portion of his illegal gambling proceeds to owners of websites in exchange for the use of the internet websites. As used by this criminal organization, the term "agent" has the same connotation as the traditional term of "bookie" or "bookmaker."
6. We have discovered that **Gurian** is using multiple accounts/websites (approximately 40-50) to place bets/wagers on a side and total of a sporting event to off-set the betting line(s), using a computer (auto bettor) with software that helps **Gurian** to place approximately 40-50 bets on one team at the same time. Conversations intercepted pursuant to wiretap orders issued in the Northern District of New York between October and December of 2012 demonstrate that **Gurian**, by his own admission, amassed approximately \$150,000 dollars per day through his illegal gambling operation. **Gurian** has more than five individuals working for him in the illegal gambling operation from Texas, California, Boston, New York, New Hampshire, Nevada, Indiana, Kansas, Las Vegas, Florida, UK, Mexico, Panama, Holland, Jamaica and Russia.
7. **Lasso** is alleged to work for **Gurian**. She is a citizen of Panama and has a visa/passport that permits her to travel to and from Panama and the United States. Communications between **Gurian** and **Lasso** have been intercepted pursuant to wiretap orders issued in the Northern District of New York that demonstrate that **Lasso** transferred money representing proceeds of illegal gambling activity for **Gurian** from the United States to Panama and elsewhere. In one of the intercepted conversations between **Gurian** and **Lasso**, **Lasso** informed **Gurian** that she tried to move/wire four (4) million dollars from a Bank

located in Panama to another Bank. She controls the bank accounts, credit cards and wire transfers for **Gurian** in his illegal gambling operation.

INTERCEPTED COMMUNICATIONS

8. October 11, 2012 intercepted conversation between **Gurian** and **Lasso** (call number 295), **Lasso** informed **Gurian** about how she tried to move/wire four (4) million dollars from 365, believed to be bet365.com, to a bank in Panama. Additionally, in this call **Lasso** indicates that 365 is not going to send it to LARIS, i.e. LARIS SA, an alleged front business:

LASSO: HI

GURIAN: HI

LASSO: DID YOU RECEIVE THE MESSAGE I SENT EARLIER
ABOUT 365?

GURIAN: WE ALREADY TALKED TO THE GUY

LASSO: NO, HE.. HE EMAILED ME THIS MORNING AND HE SAID THAT THEY WERE.. THEY'RE NOT GONNA SEND IT TO LARRIS THERE THE ONLY THE ONLY ACCOUNTS HE'S GONNA SEND TO US ONLY TWO ACCOUNTS THAT WE SENT MONEY FROM. SO THAT MEANS THAT I ONLY HAVE ONE BANK TO SEND 4 MILLION DOLLARS TOO.. UGHHH

GURIAN: HE SAID.. HE SAID, YOU CAN ONLY SEND THEM TO ONE BANK?

LASSO: HE SAID.. HE SAID.. THIS IS WHAT HE SAID.. ONE SECOND.. HE SAID, THE FUNDS WITHDRAWN.. UH TO THE (UNINTELLIGIBLE) OK WAIT.. UMM CAUSE HE SAID, OK HE SAID WE WERE WAITING FOR APPROVAL BUT UNFORTUNATELY WE HAVE REVIEWED AND DECLINED YOUR REQUEST FOR THE FUND TO BE WITHDRAWN TO THE DETAIL YOU HAVE PROVIDED.. THEY HAVE HOWEVER INFORMED ME FOR THIS WITHDRAWAL THE FUNDS WILL HAVE TO BE SENT TO ONE OF THE TWO ACCOUNTS.. ONE OF THE ACCOUNTS WE HAVE PREVIOUSLY SENT FUNDS OR RECEIVED FUNDS FROM.. THEY ARE BANCO (UNINTELLIGIBLE) AND BANCO PANAMA.. AND BANO (UNINTELLIGIBLE) DOES NOT WANT THE MONEY SO I ONLY HAVE BANCO PANAMA TO SEND IT TO.. SO I TOLD THEM WELL I'LL SEND \$100,000 TO MY CREDIT CARD THEN TO SEE HOW THAT GOES.. BUT WE'RE NOT GONNA I

MEAN AND BARB I MEAN THEY'RE NEVER GONNA TAKE 4 MILLION ON A CREDIT CARD SO.. REALLY WHAT WE ARE GONNA HAVE TO DO IS JUST SEND IT TO THAT BANK SO I ASKED FOR A STATEMENT AND MAYBE IF I PROVIDE THAT COMPLIANCE FROM THE BANK WITH THE PAYMENT THEY'LL RECEIVE ALL THE MONEY BUT.. I DON'T KNOW.

9. **Lasso** currently resides at 1655 N. Federal Highway, Delray Beach, Florida. The Quit Claim Deed filed in Palm Beach County, Florida on January 5, 2010 lists Laris, S.A., a Panama company, as the owner. Another filing lists the president of Laris, S.A. as **Lasso**. In addition to LARIS, SA, Lasso has at least two other front companies identified during the investigation, Nigel Holdings, Inc. and Nigel Holdings S.A. The designation of S.A. in Panama usually indicates Anonymous Society which is akin to "Inc." for businesses registered in the United States. The Florida Department of State, Division of Corporations records obtained through www.Sunbiz.org indicate that **Lasso** is the president of Nigel Holdings, Inc. and that the business address is located at 550 Golden Harbour Drive, Boca Raton, Florida which is **Gurian's** home address. On the same records, Nigel Holdings S.A. is listed as the VP or Vice President of Nigel Holdings, Inc. and has an address of 550 Golden Harbour Drive, Boca Raton, Florida.
10. It is evident from a conversation between **Gurian** and **Lasso** five days later, on October, 16, 2012, in which they continue to discuss moving the funds, that **Gurian** and **Lasso** use Skype's chat features to communicate regarding moving illegal gambling proceeds. Based on my training and experience, I am aware that Skype is used by those engaged in criminal activity because they believe that Skype is immune from detection by law enforcement. They also discuss in part, wire transfers to the Cayman Islands and Andorra, sending money from 365 (i.e., Bet365.com, a gambling website) to Panama, and wiring instructions found on **Gurian's** computer. The following is a substantial part of that conversation and outlines **Lasso** and **Gurian's** relationship:

GURIAN: HELLO, YOU ARE GOING TO HAVE TO COME BACK SOMETIME TOMORROW

LASO: WHAT!!!

GURIAN: YOU'RE TAKING, YOU'RE, YOU'RE...I...CAN'T, I CAN'T STAND THIS M.I.A. STUFF, IT'S NOT

LASO: M.I.A... I'M ON MY PHONE

GURIAN: MISSING IN ACTION

LASO: AND I HAVEN'T EVEN, I HAVEN'T IT'S BEEN TWO DAYS

GURIAN: WELL, YOU ARE GOING TO HAVE TO CUT YOUR TRIP SHORT, BECAUSE THIS IS NOT PROPER, YOU'RE HOLDING

LASSO: WELL, IT'S NOT HAPPENING BECAUSE I'M WORKING HARD HERE.. SO HERE'S THE DEAL BET 365 SAYS THAT THEY ARE GOING TO SEND 300 AND THEY WANT TO SEND 300 MORE THOUSAND TO BANCO (UNINTELLIGIBLE) "PANAMA BANK" AND THEN THEY CAN SEND ANYWHERE I WANT, IN PANAMA.. SO, I HAD TO OPEN A NEW ACCOUNT IN BANCO (UNINTELLIGIBLE) BECAUSE I CAN'T GO TO THAT THAT LADY THAT ALWAYS LIKE JUST DOESN'T WANT TO TAKE MY MONEY ANYMORE.. SO I HAD TO OPEN UP ANOTHER ONE IN ANOTHER BRANCH AND THEY SAID THAT I NEED A LETTER FROM 365 SAYING THAT THEY'RE GOING TO SEND THE FUNDS BACK AS LIKE RETURN OF CAPITAL OR WHATEVER THE HELL IT IS AND SO ONCE I GET THAT LETTER THEN I CAN RECEIVE THOSE FUNDS THERE. AND THEN WE CAN SEND WHEREVER WE WANT, IN PANAMA..

GURIAN: ALRIGHT

LASSO: SO I WROTE TO 365 AND I'M WAITING FOR THAT LETTER SO I CAN THAT WIRE TRANSFER AND THEN I'M GONNA HAVE \$300,000 MORE DOLLARS HERE IN MY ACCOUNT.. TO SPEND FREELY.. OH AND YOU KNOW AND IT'S GONNA STAY THERE BY THE WAY THE RATE IS 2.75 A YEAR.. I GUESS A LITTLE BIT LESS FOR 6 MONTHS..

GURIAN: AND THEN WHAT ABOUT THE REST OF IT?

LASSO: THEN WE HAVE TO FIGURE THAT OUT.. PHILL, IT'S BEEN TWO DAYS I CAN'T ACCOMPLISH THE WORLD IN TWO DAYS

GURIAN: MY FIRST CLASS TICKET I COULD RIP UP

LASSO: (LAUGHS)

GURIAN: ALL I DID IS PAY FOR YOU TO HAVE A FIGHT WITH YOUR BEAUTY.. HAIR DRESSER

LASSO: NO I'VE BEEN WORKING HARD, IT'S A PROCESS.. I'M GETTING A CALL I'LL TALK TO YOU LATER

GURIAN: WAIT WAIT, WAIT WAIT..

LASSO: WHAT (LAUGHS) WHAT WHAT (LAUGHS)

GURIAN: S & J.. S & J WIRING HOW ABOUT..

LASSO: WHAT, DID YOU SEND THE WIRE INSTRUCTIONS?

GURIAN: YES.. HOW ABOUT..

LASSO: NO, I HAVEN'T SEEN (UNINTELLIGIBLE) AND I'M ON MY WAY TO A DOCTORS APPOINTMENT SO I'LL SEND

GURIAN: EMAIL.. HEY, EMAIL TO NOAH YOUR WIRING INSTRUCTIONS.. HE NEEDS THE WIRING INSTRUCTIONS

LASSO: WHAT, I GAVE THEM TO YOU YESTERDAY

GURIAN: WHERE?

LASSO: ON SKYPE!

GURIAN: AHH..

LASSO: COPY AND PASTE THEM.. DO SOMETHING.. TALK TO YOU LATER

GURIAN: I DON'T SEE THAT HERE

LASSO: WELL.. LOOK FOR IT

GURIAN: NO THE EMAIL FOR CAYMAN..

LASSO: OH WELL WHY DID YOU ASK FOR ANDORA?

GURIAN: I DIDN'T, I ASKED YOU FOR CAYMAN.. I SAID

LASSO: YOU ASKED FOR ANDORA.. IT'S ON SKYPE

GURIAN: I NEED CAYMAN

LASSO: WELL, AREN'T THEY ON A POSTED ON YOUR DESK TOP?

GURIAN: UGH.. NOT ANYMORE.. SOMEBODY PULLED IT OFF

LASSO: NO! NO IT WAS THERE SO YOU BETTER FIND OUT HOW TO GET IT BACK BECAUSE I LEFT IT THERE FOR A PURPOSE

GURIAN: IT'S NOT HERE.. I CAN'T FIND IT

LASSO: UGH.. I'LL TALK TO YOU LATER.. THIS IS TO STRESSFUL.. I HAVE A DOCTORS APPOINTMENT TO ATTEND TO

GURIAN: HOW DO I GET IT? HOW DO I FIND IT?

LASSO: FIRST OF ALL IF YOU LOOK IN YOUR EMAIL AND IF YOU LOOK FOR NIGEL HOLDINGS YOU'RE GONNA FIND THEM LIKE SEVEN EMAILS HAVING THOSE WIRING INSTRUCTIONS

GURIAN: OK

LASSO: THAT'S ONE WAY OF GETTING THEM

GURIAN: STAY IN TOUCH PLEASE, YOUR PHONE DOESN'T WORK THERE..
YOUR CELL PHONE DOESN'T WORK THERE..

LASSO: YES IT DOES.. IT'S ON

(UNINTELLIGIBLE)

LASSO: NO, I HAVE IT.. YESTERDAY YOU CALLED THREE TIMES AND I
WAS ON THE PHONE.. I MEAN

GURIAN: UH HUH.. THAT'S WHY YOUR BLOCKING ME YOU HAVE A NEW
FEATURE THERE THAT'S LIKE BLOCKING ME

LASSO: I'M NOT BLOCKING YOU, I WAS JUST ON THE PHONE.. IF I'M ON
THE PHONE YOU CAN'T CALL BUT IF I'M NOT ON THE PHONE YOU CAN
CALL THAT'S HOW IT WORKS WITH THESE THIRD WORLD PHONES

GURIAN: WELL, WHAT ABOUT A PHONE CALL BACK..

LASSO: UGH.. WELL YOU KNOW WHAT ID DIDN'T GET IT BECAUSE I
WASN'T OFF THE PHONE TO CALL YOU BACK BEFORE YOU STARTED
CALLING AGAIN

GURIAN: WHEN CAN I GET BACK TO PANAMA

LASSO: WELL, SOON I'M GETTING AN APPOINTMENT I'M WORKING HERE,
I'M WORKING

GURIAN: WHEN ARE YOU COMING BACK?

LASSO: UGH.. NEXT MONDAY

GURIAN: JESUS CHRIST.. OK

LASSO: BYE

GURIAN: STAY IN TOUCH.. GOOD BYE

11. In a November 13, 2012 intercepted conversation with MasterCard customer service, **Gurian** states that he is a gambler and that he uses a service to hide his true IP address and make it appear as if his IP address originates in Canada, so that he can access sports betting websites from the United States:

MASTERCARD: ALRIGHT, I WOULD BE HAPPY TO REVIEW THE
ACCOUNT.. WHAT IS THE DATE OF THE CHARGE YOU ARE CALLING
REGARDING?

GURIAN: 10-14 UH TRANSACTION DATE.. POSTING DATE, 10-16.. IT'S ON
MY STATEMENT AGAIN..

MASTERCARD: OK AND WHAT IS THEY.. DO YOU THE UMM WEBSITE?

GURIAN: NO I JUST.. I WAS TRYING TO BUY A VPN FOR MY IPAD AND AND UH I FOUND THESE GUYS ONLINE AND UNFORTUNATELY I GAVE THEM MY CREDIT CARD BECAUSE THEY, I SAID I HAD TO BEFORE.. AND THEN SINCE THAT POINT ON I HAVE NEVER BEEN ABLE TO GET ANYONE ON THE PHONE.. THE SERVICE DOESN'T WORK AND THEY JUST KEEP BANGING MY CREDIT CARD

3:43- 5:00: NON-PERTINENT

MASTERCARD: IF I CAN START BY VERIFYING YOUR MAILING ADDRESS..

GURIAN: YEAH, IT'S 550 GOLDEN HARBOR DRIVE, BOCA RATON, FLORIDA 33432.

MASTERCARD: OK THANK YOU.. ALRIGHT AND THEN.. I'M GONNA GO AHEAD AND SET UP THE UMM DISPUTE CASE.. I MAY JUST HAVE TO ASK YOU A COUPLE OF THE SAME QUESTIONS THAT WE ALREADY WENT OVER.. SO UMM.. LET ME TAKE A LOOK HERE.. NOW WHAT EXACTLY WAS IT THAT YOU ORDERED, YOU SAID A VPN FOR YOUR CELL PHONE?

GURIAN: VPN FOR MY IPAD

MASTERCARD: OK AND WHAT DOES THAT ACTUALLY DO.. I'M NOT FAMILIAR WITH THAT

GURIAN: IT'S UH.. A VPN MEANING THERE THERE'S SOME THERE'S SOME WEB SITES THAT THAT AHH THAT THAT NEED TO BE ACCESSED FROM SOMEBODY OUT OUTSIDE OF THE U.S. SO, LIKE I GAMBLE.. I GAMBLE ON SPORTS SO I NEEDED, I NEEDED.. UGH UGH A VPN TO MAKE IT LOOK LIKE THE ORIGIN.. THE ORGIN OF OF MY LOGS IN WERE FROM CANADA.. SO THEY OFFER A SERVICE THAT'S LIKE A HIDE MY IP ADDRESS.. SO THEY OFFER THAT SERVICE WHICH I I SIGNED UP FOR AND UH.. I HAVE BEEN UNABLE TO INSTALL IT THEY SENT ME INSTRUCTIONS HOW TO INSTALL IT A FEW TIMES.. THE INSTRUCTIONS DON'T WORK AND THEN WHEN I GET BACK TO THEM, HEY THIS DOESN'T WORK, I NEED CUSTOMER SUPPORT, I NEED HELP.. I GET NOTHING AND THEN AND THEN I KEEP GETTING BILLED AND THEN IT'S LIKE OK FOR THE FIRST MONTH I SAID LOOK OBVIOUSLY YOU HAVE NO CUSTOMER SUPPORT, NO PHONE NUMBER I SAID JUST STOP BILLING ME.. I . I NO LONGER WANT THIS SERVICE AND THEN UHH.. AND THEN THEY INSTRUCTED ME AS TO HOW I GET THEM TO STOP BILLING ME WHICH I DID, I GOT THE BILL THE NEXT MONTH AND I SAID, HEY, I SAID I GOT BILLED AGAIN I ASKED YOU TO STOP BILLING ME AND THEN UGH.. FROM THAT POINT ON IT JUST YOU KNOW.. IT BECAME PRETTY OBVIOUS I MEAN THAT THIS IS JUST A CON..

MASTERCARD: OK

MONEY LAUNDERING

12. Beginning on or about November 2009 and continuing through on or about September 2012 within the Northern District of New York, and elsewhere, **Gurian** and **Lasso**, did unlawfully, willfully and knowingly combine, conspire, confederate and agree together and with each other, and with others known and unknown to commit certain offenses under Title 18, United States Code, Sections 1956(h) and 1956(a)(1)(B)(i), as follows:
 - a. Did knowingly and willfully conspire and agree with each other and with others to conduct financial transactions knowing that they involved the proceeds of a specified unlawful activity, specifically the conducting of an illegal gambling business, in violation of Title 18, United States Code, Section 1955, among others, and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of property that was the proceeds of specified unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1)(B)(i). In violation of Title 18, United States Code, Section 1956(h).
13. **Gurian** and **Lasso** have generated proceeds from their illegal gambling business which they have used to support their standard of living, acquire assets, and deposit a portion of the proceeds into their personal financial accounts, as well as financial accounts held in the names of their front companies and/or nominees.
14. From approximately November 2009 to September of 2012, **Gurian** and **Lasso** caused to be deposited into bank accounts held in **Lasso's** name as well as in the name of Nigel Holdings, and other businesses currently known and unknown, millions of dollars of gambling proceeds.
15. A review of bank records obtained during this investigation revealed that on March 7, 2012 **Lasso** sent a \$300,000 wire out of her personal Bank of America Account ending 4932 to Nigel Holdings S.A. at the Caledonian Bank in the Cayman Islands. In addition, from November of 2010 through June of 2012, **Lasso** wired out in excess of \$1.2 million dollars to Panama for which she was the beneficiary. Those transactions are as follows:

	<u>DATE</u>	<u>AMOUNT</u>	<u>BANK NAME</u>
1.	11/24/10	\$25,000	Banco General, S.A.
2.	02/01/11	\$70,000	Banco General, S.A.
3.	03/25/11	\$35,000	Banco General, S.A.
4.	06/03/11	\$15,000	Banco General, S.A.
5.	06/09/11	\$30,000	Banco Panama S.A.
6.	07/20/11	\$90,000	HSBC Bank Panama S.A.
7.	04/24/12	\$100,000	Banco General, S.A.
8.	05/10/12	\$150,000	Banco Panama S.A.
9.	05/15/12	\$400,000	Banco Panama S.A.
10	05/15/12	\$300,000	Banco Panama S.A.
11.	06/28/12	\$60,000	Banco Panama S.A.

Based on these transactions and the intercepted calls described above, **Lasso** appears to be using foreign corporations and offshore accounts to launder the proceeds of the internet gambling enterprise.

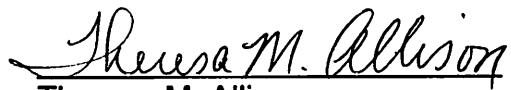
16. An analysis of financial records obtained during the investigation indicates that **Lasso** has conducted transactions with conspirators involved in the illegal gambling enterprise. The checks were deposited into a nominee account or into business bank accounts or wired from Lasso's Bank of America account in an attempt to conceal and disguise the nature, location, source, ownership, and control of property that was the proceeds of specified unlawful activity (the illegal gambling business). Some of those transactions are as follows:

- a. On August 4, 2010, **Lasso** made a check payable to cash in the amount of \$30,000. The check was endorsed by **JV**, a conspirator known to your Affiant, and deposited in a Bank of America account that same day. These funds are believed to be a payment for gambling debt owed to **AG**, another conspirator known to your Affiant;
- b. On October 30, 2010, **Lasso** made a check payable to cash for \$52,482.55 which was deposited into **AG's** business bank account held JP Morgan Chase Bank on November 15, 2010;
- c. On April 11, 2011, **Lasso** wrote a check payable to **AG's** business for \$60,000.00 that was deposited on April 12, 2011 into **AG's** business bank account held at JP Morgan Chase Bank;
- d. On September 21, 2011, **Lasso** wrote a check payable to **ML's** business, a conspirator known to your Affiant, for \$30,000.00. This check was deposited into **ML's** business bank account at Bank of America on September 21, 2011;

- e. On September 23, 2011, **Lasso** wrote a check payable to **ML's** business for \$22,000.00. This check was deposited into **ML's** business bank account at Bank of America on September 23, 2011;
 - f. On July 5, 2012, **Lasso** wired \$75,000 to **MS**, a gambler and bookmaker known to your Affiant, which was deposited into **MS's** bank account at RBS Citizens in Albany, New York.
17. An analysis of financial records obtained during the investigation indicates that **Lasso** has received payments from gamblers and conspirators involved in the illegal gambling enterprise being administered by **Gurian**. The checks were deposited into an account in her name or into business bank accounts in an attempt to conceal and disguise the nature, location, source, ownership, and control of property that was the proceeds of specified unlawful activity. Some of these transactions are as follows:
- a. On February 15, 2011, **Lasso** deposited a \$90,000 check from **ML's** business into her Bank of American account ending 4932;
 - b. On March 25, 2011 **Lasso** deposited a \$55,000 check from **ML's** business into her Bank of American account ending 4932;
 - c. On April 19, 2011 **Lasso** deposited a \$50,000 check from **ML's** business into her Bank of American account ending 4932;
 - d. On May 2, 2011 **Lasso** deposited a \$40,000 check from **ML's** business into her Bank of American account ending 4932;

CONCLUSION

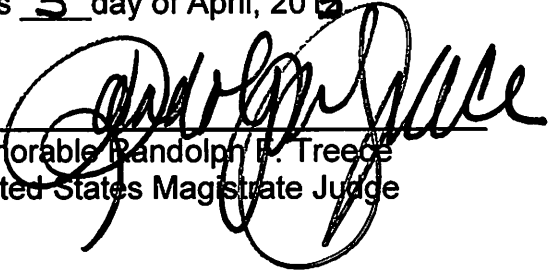
18. Based on the foregoing, the undersigned respectfully submits that there is probable cause to believe that **PHIL GURIAN** and **MICHELE LASSO** (**Lasso**) a/k/a **MICHELE MARIE LASSO-BARRAZA** (**Lopez**) committed money laundering and conspiracy to commit money laundering in violation of Title 18 U.S.C. Sections 1956(a)(1)(B)(i) and 1956(h).



Theresa M. Allison
Special Agent
Internal Revenue Service,
Criminal Investigation

Sworn before me and subscribed in my presence

This 3 day of April, 2013



Honorable Randolph F. Treece
United States Magistrate Judge

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